

**IN THE UNITED STATES DISTRICT COURT IN THE
EASTERN DISTRICT OF PENNSYLVANIA**

Vonda Pearson as Administratrix of	:	
The Estate of Cornell Pearson	:	Civil 23-4444
V	:	
Marple Township, et al	:	

**MOTION FOR SANCTIONS FOR FAILURE TO COMPLY WITH COURT ORDER RE DISCOVERY
ANSWERS**

NOW COMES counsel for Defendants Marple Township, et al, requesting an Order sanctioning Plaintiff for failure to provide answers to discovery requests, as ORDERED by the Court, and avers as follows:

1. A Complaint was filed by the Plaintiff in Federal Court on November 12, 2023.
2. On January 5, 2024, counsel for defendants served upon Plaintiff's counsel the Self Executing Disclosures of the defendants.
3. On the same date, counsel for Defendants served upon counsel for Plaintiff a Request for Production of Documents, and requested she respond within the 30 days allowed by the Rules of Civil Procedure.
4. No response was provided, so counsel filed a Motion to Compel, which this Court granted by Order dated February 29, 2024. The Court allowed for full responses "within 20 days of this Order, or risk the imposition of sanctions".
5. No responses were provided within 20 days (or, March 20, 2024). Counsel has not responded in any way to the Order.
6. The attorneys of record were scheduled to conduct their Rule 26(f) conference call on the afternoon of March 25, 2024 at 3:00 PM. Undersigned counsel called the office of Plaintiff's counsel, but counsel was not present to receive the call, so undersigned left a

voicemail. That was followed up with an email, asking, *inter alia*, about the overdue discovery responses. A true and correct copy is attached as exhibit A.

WHEREFORE, the moving Defendants respectfully request the Court to enter an Order imposing sanctions on Plaintiff for failing comply with this Court's Order to timely provide full and complete answers to the request for production of documents.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'A. Bellwoar', with a long horizontal flourish extending to the right.

Andrew Bellwoar, Esq.

PA ID # 54096

126 W. Miner Street

West Chester, PA 19382

abellwoar@bellwoarkelly.com

610 314 7066